

# **GSD-08 HAZARDOUS AIR POLLUTANT EMISSIONS SUMMARY- INSTRUCTIONS**

The purpose of GSD-08 is to provide the actual and potential emissions of each hazardous air pollutant (HAP) emitted from the source. Indiana does not have de minimis levels for HAPs, therefore all emissions that can be reasonably quantified must be included on this form. This form is required for all air permit applications submitted to the <a href="Indiana">Indiana</a> <a href="Department of Environmental Management (IDEM)</a>, <a href="Office of Air Quality (OAQ)</a>. For the purposes of this form, the term "source" refers to the plant as a whole and NOT to the individual emissions units.

If you have any questions, contact the IDEM OAQ Permit Reviewer of the Day (PROD) at (317) 233-0178 or 1-800-451-6027 extension 3-0178 (toll free call within Indiana) or via electronic mail using the <u>online form</u> or a direct email to OAMPROD@dem.state.in.us.

#### SUBMISSION OF CONFIDENTIAL RECORDS

All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claim of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 326 IAC 17.1-4-1. Failure to follow these requirements exactly, will result in your confidential information becoming a public record, available for public inspection. To ensure that your information remains confidential, refer to the IDEM, OAQ information regarding submittal of confidential business information. For more information on confidentiality for certain types of business information, please review IDEM's Nonrule Policy Document Air-031-NPD regarding Emission Data.

# Part A: Unit Emissions Summary:

Part A is intended to provide the actual and potential emissions of each hazardous air pollutant emitted from each emissions unit. If you do not provide the enough information to adequately describe the emissions from each emissions unit, the application process may be stopped.

### 1. Unit ID:

Provide the identification number for each emissions unit. The identification numbers listed on this form should correspond to the emissions unit identified on the Plant Layout and Process Flow diagrams.

#### 2. Stack / Vent ID:

Provide the identification number for each stack or vent to which this emissions unit exhausts. The identification numbers listed on this form should correspond to the stacks and vents identified on the Plant Layout and Process Flow diagrams.

### 3. Hazardous Air Pollutant:

For each emissions unit identified, list each hazardous air pollutant (HAP) emitted to the atmosphere during normal operation. If there are multiple pollutants for an emissions unit, use a new row for each pollutant. For a complete list of HAPs, please refer to the <u>United States Environmental Protection Agency's (US EPA)</u> <u>Air Toxics Website (ATW)</u> original list of HAPs and list of modifications to the HAPs.

# 4. CAS No.:

Provide the Chemical Abstract Series (CAS) number associated with the hazardous air pollutant, if applicable.

#### 5. Actual Emissions:

For each emissions unit specific pollutant identified, provide the actual emissions level based on normal operating conditions (i.e., actual hours of operation, using control equipment, etc.) in standard units and also in tons per year (tpy). Since the units will vary depending on the process, appropriate units must be included or the application process may be stopped. The standard units used for this form should correspond to the units used on form CD-01, Facility/Unit Compliance Status. The annual emissions level should be calculated using data from the previous year of operation and should correspond to the emissions reported on the Annual Emission Statement (if required). It is important to provide an estimate of actual emissions so we can compare this number to the potential to emit.

# 6. Potential Emissions:

For each emissions unit specific pollutant identified, provide the total potential to emit in standard units and also in tons per year (tpy) based on the maximum design capacity of the emissions unit and operating at 8760 hours/year. Since the units will vary depending on the process, appropriate units must be included or the application process may be stopped. The standard units used for this form should correspond to the units used on form CD-01, Facility/Unit Compliance Status.

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NOTE: Indiana Law requires permit emission limits to be based on the <u>potential to emit (PTE)</u> air pollutants as if the process was operating at full capacity 24 hours per day, seven (7) days per week and 365 days per year.

Some sources may opt to take a limit on the potential to emit for the entire source, or individual processes, in order to better reflect the actual operating scenario. Limitations on operations (work practices) or emissions (control equipment) may be included in the calculations only to the extent that the limitations are federally enforceable (required by NSPS, NESHAP, approved SIP requirement, NSR/PSD permit condition, etc.). Limitations that are not federally enforceable cannot be included (state only requirement, local agency permit condition, etc.).

# Part B: Pollutant Emissions Summary:

Part B is intended to provide the total actual and potential emissions of each hazardous air pollutant emitted from the source (including all emissions units and fugitive emissions at the source). If you do not provide the enough information to adequately describe the total source emissions, the application process may be stopped.

### 7. Hazardous Air Pollutant:

List each hazardous air pollutant emitted to the atmosphere during normal operation of the source.

#### CAS No.

Provide the Chemical Abstract Series (CAS) number associated with the hazardous air pollutant, if applicable.

### 9. Actual Emissions:

Provide the total source-wide actual emissions level for each pollutant based on normal operating conditions (i.e., actual hours of operation, using control equipment, etc.) in standard units and also in tons per year (tpy). Since the units will vary depending on the process, appropriate units must be included or the application process may be stopped. The standard units used for this form should correspond to the units used on form CD-01, Facility/Unit Compliance Status. The annual emissions level should be calculated using data from the previous year of operation and should correspond to the emissions reported on the Annual Emission Statement (if required). It is important to provide an estimate of actual emissions so we can compare this number to the potential to emit.

#### 10. Potential Emissions:

Provide the total source-wide potential to emit in standard units and also in tons per year (tpy) based on the maximum design capacity of each emissions unit and operating at 8760 hours/year. Since the units will vary depending on the process, appropriate units must be included or the application process may be stopped. The standard units used for this form should correspond to the units used on form CD-01, Facility/Unit Compliance Status.

NOTE: Indiana Law requires permit emission limits to be based on the <u>potential to emit (PTE)</u> air pollutants as if the process was operating at full capacity 24 hours per day, seven (7) days per week and 365 days per year.

Some sources may opt to take a limit on the potential to emit for the entire source, or individual processes, in order to better reflect the actual operating scenario. Limitations on operations (work practices) or emissions (control equipment) may be included in the calculations only to the extent that the limitations are federally enforceable (required by NSPS, NESHAP, approved SIP requirement, NSR/PSD permit condition, etc.). Limitations that are not federally enforceable cannot be included (state only requirement, local agency permit condition, etc.).

# Summary of Websites

- 1. Indiana Department of Environmental Management (IDEM): http://www.in.gov/idem/
- Office of Air Quality (OAQ): <a href="http://www.in.gov/idem/air/">http://www.in.gov/idem/air/</a>
- 3. Permit Reviewer of the Day (PROD) online form: http://www.in.gov/idem/air/permits/prodform.html
- 4. Article 17.1, Rule 4, Section 1 of the Indiana Administrative Code (326 IAC 17.1-4-1): <a href="http://www.in.gov/legislative/iac/T03260/A00171.PDF">http://www.in.gov/legislative/iac/T03260/A00171.PDF</a>
- 5. IDEM, OAQ guidance regarding submittal of confidential business information: http://www.in.gov/idem/air/permits/apps/cbi.pdf
- 6. IDEM's Nonrule Policy Document regarding Emission Data (Air-031-NPD): http://www.in.gov/idem/air/rules/nrpd/index.html
- 7. United States Environmental Protection Agency (US EPA): <a href="http://www.epa.gov">http://www.epa.gov</a>
- 8. US EPA Air Toxics Website (ATW): http://www.epa.gov/ttn/atw
- 9. US EPA Air Toxics Website (ATW) Original List of HAPs: http://www.epa.gov/ttn/atw/orig189.html

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- 10. US EPA Air Toxics Website (ATW) List of Modifications to the HAPs List: http://www.epa.gov/ttn/atw/pollutants/atwsmod.html
- 11. Explanation of Potential To Emit: <a href="http://www.in.gov/idem/guides/permit/air/airemissions.html#pte">http://www.in.gov/idem/guides/permit/air/airemissions.html#pte</a>

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